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October 25, 2022

VIA ECF

Honorable Paul G. Gardephe
United States District Court
Southern District of New York
40 Foley Square, Room 2204
New York, New York, 10007

Re: Levente Nagy v. MHP Land Associates, LLC, et al.
Case No.: 19-cv-06395-PGG-RWL

Your Honor:

We represent plaintiff, Levente Nagy, in this matter. A final pretrial conference and a hearing on plaintiff's motion in limine to preclude Dr. Jeffrey Spivak and Dr. Jonathan S. Luchs from testifying on behalf of defendants is scheduled to be held tomorrow, October 26, 2022, at 2:00PM.

Pursuant to this Court's Order [DE 101], Your Honor directed the parties to be prepared to offer testimony from witnesses with personal knowledge of the disputed facts. Presently, our office has two witnesses who can offer personal knowledge of the disputed facts, myself and our head paralegal Chun Yip So.

However, I am writing to request that the hearing be briefly adjourned to the next morning, as I had previously booked a flight and will be traveling out of state tomorrow afternoon due to a family issue. Further, my paralegal Chun is scheduled to attend a defense medical examination with the plaintiff in another action - who is a paraplegic due to the injuries he sustained in a fall, *21-cv-06006-KPF-KHP Rivera v. Lettire Construction Corp. et al.* on Wednesday at 2:00PM.

Due to the foregoing, I respectfully request that **only** the hearing on plaintiff's motion in limine be briefly adjourned one day, to the next morning¹, and that I be allowed to appear via telephone conference. My paralegal can appear in person with the handling attorney, John Della

¹ The reason for our request for the hearing to be held in the morning is because, although I am available in the afternoon, Mr. Della Jacono, is presently scheduled to appear on a conference in the matter of *18-cv-07402-NGG-ST Moonasar v. Northridge Cooperative Section No. II, Inc. et al.* on Thursday, October 27, 2022, at 2:00PM.

Jacono. Mr. Della Jacono is available to appear at the pretrial conference presently scheduled for tomorrow at 2:00PM.

Thank you for your consideration of our request.

Respectfully,

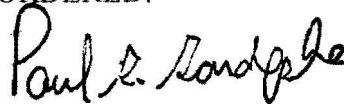


Holly Ostrov Ronai (HO3923)

Cc: All parties via ECF

MEMO ENDORED: The application is denied. The hearing will proceed tomorrow as scheduled.

SO ORDERED.



Paul G. Gardephe
United States District Judge
Date: October 25, 2022